

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** _____

JOSE IVAN SERRANO,	:	VIOLATIONS: 21 U.S.C. § 846
a/k/a "Joey"	:	(Conspiracy to distribute in
EDWARD CASTRO, JR.,	:	excess of 50 grams of cocaine
a/k/a "Eddie"	:	base ("crack") - 1 count)
a/k/a "Big E"	:	21 U.S.C. § 841(a)(1)
LUIS JOSE ARIAS,	:	(Possession of cocaine base
a/k/a "Obdulio Martinez, Jr."	:	("crack") with the intent
a/k/a "Pedro Garces"	:	to distribute - 3 counts)
a/k/a "Lite"	:	21 U.S.C. § 841(a)(1)
RAYMOND JACKSON,	:	(Possession of cocaine with the
a/k/a "Brooklyn"	:	intent to distribute - 2 counts)
RAFAEL ROBLES,	:	21 U.S.C. § 841(a)(1)
a/k/a "Deville"	:	(Distribution of cocaine base
ISMAEL ROJAS, JR.,	:	("crack") - 5 counts)
a/k/a "Izzy"	:	21 U.S.C. § 860(a)
CARLOS LUIS SOTO,	:	(Possession of cocaine base
a/k/a "Carlito"	:	("crack") with the intent to
	:	distribute within 1000 feet of a
	:	school - 3 counts)
	:	21 U.S.C. § 860(a)
	:	(Possession of cocaine with
	:	the intent to distribute within
	:	1000 feet of a school - 2 counts)
	:	21 U.S.C. § 860(a)
	:	(Distribution of cocaine base ("crack")
	:	within 1000 feet of a school - 5 counts)
	:	21 U.S.C. § 861(l)
	:	(Employing a juvenile to
	:	distribute cocaine base
	:	("crack") - 1 count)
	:	18 U.S.C. § 924(c)
	:	(Possession of a firearm in
	:	furtherance of a drug trafficking
	:	offense – 1 count)
	:	21 U.S.C. § 853
	:	(Criminal forfeiture)
	:	18 U.S.C. § 2
	:	(Aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about January, 1999, through the return of the indictment, at Reading, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JOSE IVAN SERRANO,
a/k/a "Joey"
EDWARD CASTRO, JR.,
a/k/a "Eddie"
a/k/a "Big E"
LUIS JOSE ARIAS,
a/k/a "Obdulio Martinez, Jr."
a/k/a "Pedro Garces"
a/k/a "Lite"
RAYMOND JACKSON,
a/k/a "Brooklyn"
RAFAEL ROBLES,
a/k/a "Deville"
ISMAEL ROJAS, JR.,
a/k/a "Izzy"
CARLOS LUIS SOTO,
a/k/a "Carlito"**

did conspire and agree, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute in excess of 50 grams, that is, in excess of 23 kilograms, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS

It was a part of the conspiracy that:

2. The SERRANO CRACK COCAINE DISTRIBUTION

ORGANIZATION (SCCDO) operated in the southwest section of the City of Reading, Pennsylvania and included more than 15 members who purchased and sold more than \$1,900,000 of cocaine base ("crack") on a wholesale and retail basis.

3. From in or about January, 1999, to in or about January, 2000, defendant JOSE IVAN SERRANO staffed, supervised, managed, controlled, and supplied the locations listed below in the City of Reading with cocaine base ("crack") which members of the SCCDO sold to customers.

- 147 S. 4th Street;
- 200 block South 4th Street;
- 300 block South 4th Street;
- 412 S. 5th Street, 3rd floor apartment.

4. From in or about January, 2000, to in or about March, 2002, defendants JOSE IVAN SERRANO, EDWARD CASTRO, JR., LUIS JOSE ARIAS, RAYMOND JACKSON, RAFAEL ROBLES staffed, supervised, managed, controlled, and supplied the locations listed below in the City of Reading with cocaine base ("crack") which members of the SCCDO sold to customers.

- 412 S. 5th Street, 3rd floor apartment;
- 214 S. 4th Street;
- 211 Carpenter Street;

- 420 Franklin Street;
- 327-329 S. 4th Street.

5. From in or about March, 2002, to in or about March, 2003, defendants JOSE IVAN SERRANO, CARLOS LUIS SOTO, and ISMAEL ROJAS, staffed, supervised, managed, controlled, led, and supplied the locations listed below in the City of Reading with cocaine base ("crack") which members of the SCCDO sold to customers.

- 300 block South 4th Street;
- 203 South 4th Street;
- 136 South 4th Street;
- 300 block Pine Street;
- 19 South 3rd Street.

6. Defendants JOSE IVAN SERRANO and EDWARD CASTRO, JR. purchased cocaine from suppliers in Reading, and elsewhere, which SERRANO, CASTRO and others at their direction processed into cocaine base ("crack"). SERRANO and CASTRO then delivered the cocaine base ("crack") to other members of the SCCDO for distribution at the locations listed in ¶¶ 3 to 5.

7. Defendants LUIS JOSE ARIAS, RAYMOND JACKSON, RAFAEL ROBLES, ISMAEL ROJAS, JR., and CARLOS LUIS SOTO were responsible for distributing bundles of cocaine base ("crack"), consisting of 25 packets of cocaine base ("crack"), to other members of the SCCDO, who sold the crack cocaine to customers at some of the SCCDO controlled locations listed in ¶¶ 3 to 5.

8. Defendants JOSE IVAN SERRANO and EDWARD CASTRO, JR.

employed various individuals, including defendants LUIS JOSE ARIAS, RAYMOND JACKSON, RAFAEL ROBLES, JR., ISMAEL ROJAS, JR., and CARLOS LUIS SOTO, as sellers of cocaine base ("crack") at the SCCDO locations listed in ¶¶ 3 to 5.

9. Defendants JOSE IVAN SERRANO, EDWARD CASTRO, JR., LUIS JOSE ARIAS, RAYMOND JACKSON, and RAFAEL ROBLES used and carried firearms to protect the SCCDO locations they controlled and to prevent the theft of cocaine base ("crack") sold by the SCCDO.

10. Defendants JOSE IVAN SERRANO and EDWARD CASTRO, JR. shared in the profits of the organization in proportion to the amount of money they had contributed to the purchase of the bulk cocaine.

11. Defendants JOSE IVAN SERRANO and EDWARD CASTRO, JR. paid workers, including LUIS JOSE ARIAS, RAYMOND JACKSON, RAFAEL ROBLES, ISMAEL ROJAS, JR. and CARLOS LUIS SOTO, in cash from the proceeds of cocaine base ("crack") sales to customers as follows: street sellers were paid either \$50 per bundle of 25 \$10 packets they sold or \$160 per bundle of 33 \$20 packets they sold.

12. To protect the SCCDO operation:

a. members of the SCCDO, including defendants JOSE IVAN SERRANO, EDWARD CASTRO, JR., LUIS JOSE ARIAS, RAYMOND JACKSON, RAFAEL ROBLES and ISMAEL ROJAS, JR. carried and were in possession of firearms and bulletproof vests to protect themselves and their cocaine base ("crack") sales locations; and

b. defendants JOSE IVAN SERRANO, EDWARD CASTRO, JR., LUIS JOSE ARIAS, RAYMOND JACKSON, RAFAEL ROBLES, ISMAEL ROJAS, JR. and

CARLOS LUIS SOTO often carried and used cellular phones and two-way radios to speak with other members of the SCCDO.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the following overt acts, among others, were performed in Reading, in the Eastern District of Pennsylvania, and elsewhere:

1. In or about January, 1999, defendant EDWARD CASTRO, JR. agreed to supply cocaine to JOSE IVAN SERRANO to be processed into and distributed as cocaine base ("crack") in Reading, Pennsylvania.
2. In or about January, 1999, defendant JOSE IVAN SERRANO purchased cocaine from Person #1 known to the grand jury to be processed into and distributed as cocaine base ("crack") in Reading, Pennsylvania.
3. In or about January, 1999, defendant EDWARD CASTRO, JR. processed the cocaine purchased by JOSE IVAN SERRANO into cocaine base ("crack") to be distributed in Reading, Pennsylvania.
4. On or about June 14, 1999, at the direction of defendant JOSE IVAN SERRANO, Persons #2 and #3 known to the grand jury:
 - a. possessed 20 grams of cocaine base ("crack") and 32.4 grams of cocaine which they intended to sell from 147 South 4th Street, 3rd floor apartment, in Reading, Pennsylvania; and
 - b. Person #2 kept a Glock, Model 30, .45 caliber semiautomatic pistol, serial number CWR239 to protect drug sales at 147 South 4th Street, 3rd floor apartment, in

Reading, Pennsylvania.

5. In or about December, 2000, defendant JOSE IVAN SERRANO established a cocaine base ("crack") distribution operation at 412 S. 5th Street, 3rd floor apartment in Reading, Pennsylvania.

6. In or about January, 2001, defendants JOSE IVAN SERRANO, EDWARD CASTRO, JR, and Person #4 known to the grand jury agreed to distribute cocaine base ("crack") together at the residence located at 412 S. 5th Street, 3rd floor apartment in Reading, Pennsylvania.

7. Between in or about January, 2001 and March 1, 2001, at the direction of defendants JOSE IVAN SERRANO and EDWARD CASTRO, JR., defendants LUIS JOSE ARIAS, RAYMOND JACKSON, RAFAEL ROBLES, and other individuals known to the grand jury distributed cocaine base ("crack") from 412 S. 5th Street, 3rd floor apartment in Reading Pennsylvania.

8. On or about March 1, 2001, at the direction of defendants JOSE IVAN SERRANO and EDWARD CASTRO, JR., Persons #5 and #6 known to the grand jury possessed 75 packets of cocaine base ("crack") which they intended to sell from 412 S. 5th Street, 3rd floor apartment in Reading, Pennsylvania.

9. On or about June 21, 2001, at the direction of defendants JOSE IVAN SERRANO and EDWARD CASTRO, JR., defendant RAYMOND JACKSON and Person #7 known to the grand jury possessed 23 packets of cocaine base ("crack") which they intended to sell from 420 Franklin Street in Reading, Pennsylvania.

10. On or about August 18, 2001, at the direction of defendants JOSE IVAN

SERRANO and EDWARD CASTRO, JR., Person #7 known to the grand jury:

- a. possessed 75 packets of cocaine base ("crack") and 11 packets of cocaine which he intended to sell in the 100 block of S. 3rd Street in Reading, Pennsylvania; and
- b. possessed a Smith and Wesson, 9 mm., semi-automatic handgun, serial number PAY7268, and a bulletproof vest in furtherance of his drug trafficking activities in the 100 block of S. 3rd Street in Reading, Pennsylvania.

11. On or about November 29, 2001, defendants JOSE IVAN SERRANO and ISMAEL ROJAS, JR. distributed 26.5 grams of cocaine base ("crack") to Person #8 known to the grand jury in Reading, Pennsylvania.

12. On or about October 29, 2002, at the direction of defendant JOSE IVAN SERRANO, defendant CARLOS LUIS SOTO delivered approximately 3.9 grams of cocaine base ("crack") to an undercover law enforcement officer in Reading, Pennsylvania.

13. On or about November 5, 2002, at the direction of defendant JOSE IVAN SERRANO, defendant ISMAEL ROJAS, JR.:

- a. possessed 75 packets of cocaine base ("crack") which he intended to sell in the 200 block of S. 4th Street, Reading, Pennsylvania; and
- b. possessed a bulletproof vest in furtherance of his drug trafficking activities in the 200 block of S. 4th Street, Reading, Pennsylvania.

14. On or about November 7, 2002, at the direction of defendant JOSE IVAN SERRANO, defendant CARLOS LUIS SOTO delivered approximately one quarter ounce of cocaine base ("crack") to an undercover law enforcement officer in Reading, Pennsylvania.

15. On or about November 21, 2002, at the direction of defendant JOSE

IVAN SERRANO, defendant CARLOS LUIS SOTO delivered approximately one half ounce of cocaine base ("crack") to an undercover law enforcement officer in Reading, Pennsylvania.

16. On or about January 6, 2003, defendant JOSE IVAN SERRANO delivered cocaine base ("crack") to Person #9, a juvenile known to the grand jury, for distribution from 19 S. 3rd Street in Reading, Pennsylvania.

17. On or about January 6, 2003, at the direction of defendant JOSE IVAN SERRANO, Person #9 delivered four packets of cocaine base ("crack") to an undercover law enforcement officer at 19 S. 3rd Street in Reading, Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 14, 1999, at Reading, in the Eastern District of Pennsylvania, defendant

**JOSE IVAN SERRANO,
a/k/a "Joey,"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, in excess of 5 grams, that is approximately 20 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 14, 1999, at Reading, in the Eastern District of Pennsylvania, defendant

**JOSE IVAN SERRANO,
a/k/a "Joey,"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, in excess of 5 grams, that is approximately 20 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School, a public middle school, located at 300 Chestnut Street, in Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 14, 1999, at Reading, in the Eastern District of Pennsylvania, defendant

**JOSE IVAN SERRANO,
a/k/a "Joey,"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 14, 1999, at Reading, in the Eastern District of Pennsylvania, defendant

**JOSE IVAN SERRANO,
a/k/a "Joey,"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School, a public middle school, located at 300 Chestnut Street, in Reading, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 14, 1999, at Reading, in the Eastern District of Pennsylvania, defendant

**JOSE IVAN SERRANO,
a/k/a "Joey,"**

did knowingly possess, and did aid and abet the possession of, a firearm, that is, a Glock, Model 30, .45 caliber semiautomatic pistol, serial number CWR239, fully loaded with ammunition, in furtherance of a drug trafficking offense for which he may be prosecuted in a court of the United States, that is, possession of cocaine base ("crack") and cocaine with intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Counts Two and Four of this indictment

In violation of Title 18, United States Code, Section 924(c)(1), and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 1, 2001, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
EDWARD CASTRO, JR.,
a/k/a "Eddie"
a/k/a "Big E"
LUIS JOSE ARIAS,
a/k/a "Obdulio Martinez, Jr."
a/k/a "Pedro Garces"
a/k/a "Lite"
RAYMOND JACKSON,
a/k/a "Brooklyn"
and
RAFAEL ROBLES,
a/k/a "Denville"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, in excess of 5 grams, that is approximately 10 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 1, 2001, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
EDWARD CASTRO, JR.,
a/k/a "Eddie"
a/k/a "Big E"
LUIS JOSE ARIAS,
a/k/a "Obdulio Martinez, Jr."
a/k/a "Pedro Garces"
a/k/a "Lite"
RAYMOND JACKSON,
a/k/a "Brooklyn"
and
RAFAEL ROBLES,
a/k/a "Deville"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, in excess of 5 grams, that is approximately 10 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School, a public middle school, located at 300 Chestnut Street, in Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 18, 2001, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
EDWARD CASTRO, JR.,
a/k/a "Eddie"
a/k/a "Big E"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, in excess of 5 grams, that is approximately 12.8 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 18, 2001, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
EDWARD CASTRO, JR.,
a/k/a "Eddie"
a/k/a "Big E"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, in excess of 5 grams, that is approximately 12.8 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School, a public middle school, located at 300 Chestnut Street, in Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 18, 2001, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
EDWARD CASTRO, JR.,
a/k/a "Eddie"
a/k/a "Big E"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the
possession with intent to distribute of, a mixture or substance containing a detectable amount of
cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and
Title 18, United States Code, Section 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 18, 2001, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
EDWARD CASTRO, JR.,
a/k/a "Eddie"
a/k/a "Big E"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School, a public middle school, located at 300 Chestnut Street, in Reading, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 29, 2001, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
ISMAEL ROJAS, JR.,
a/k/a "Izzy"**

did knowingly and intentionally distribute, and did aid and abet the distribution of, in excess of 5 grams, that is approximately 26.5 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 29, 2001, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
ISMAEL ROJAS, JR.,
a/k/a "Izzy"**

did knowingly and intentionally distribute, and did aid and abet the distribution of, in excess of 5 grams, that is approximately 26.5 grams, a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School, a public middle school, located at 300 Chestnut Street, in Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 29, 2002, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
CARLOS LUIS SOTO,
a/k/a "Carlito"**

did knowingly and intentionally distribute, and did aid and abet the distribution of, a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 29, 2002, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
CARLOS LUIS SOTO,
a/k/a "Carlito"**

did knowingly and intentionally distribute, and did aid and abet the distribution of, a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School, a public middle school, located at 300 Chestnut Street, in Reading, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2002, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
ISMAEL ROJAS, JR.,
a/k/a "Izzy"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, in excess of 5 grams, that is approximately 13.1 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2002, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
ISMAEL ROJAS, JR.,
a/k/a "Izzy"**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, in excess of 5 grams, that is approximately 13.1 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School, a public middle school, located at 300 Chestnut Street, in Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 7, 2002, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
CARLOS LUIS SOTO,
a/k/a "Carlito"**

did knowingly and intentionally distribute, and did aid and abet the distribution of, in excess of 5 grams, that is approximately 6.8 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 7, 2002, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
CARLOS LUIS SOTO,
a/k/a "Carlito"**

did knowingly and intentionally distribute, and did aid and abet the distribution of, in excess of 5 grams, that is approximately 6.8 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School, a public middle school, located at 300 Chestnut Street, in Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 21, 2002, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
CARLOS LUIS SOTO,
a/k/a "Carlito"**

did knowingly and intentionally distribute, and did aid and abet the distribution of, in excess of 5 grams, that is approximately 13.6 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 21, 2002, at Reading, in the Eastern District of Pennsylvania,
defendants

**JOSE IVAN SERRANO,
a/k/a "Joey,"
and
CARLOS LUIS SOTO,
a/k/a "Carlito"**

did knowingly and intentionally distribute, and did aid and abet the distribution of, in excess of 5 grams, that is approximately 13.6 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School, a public middle school, located at 300 Chestnut Street, in Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 6, 2003, at Reading, in the Eastern District of Pennsylvania,
defendant

**JOSE IVAN SERRANO,
a/k/a "Joey,"**

a person at least eighteen years of age, did knowingly and intentionally employ, hire, use, persuade, induce, entice, and coerce Person #9 known to the grand jury, a person under eighteen years of age, to distribute a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 861(a)(1).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 21, United States Code, Sections 846, 841(a)(1), 860(a) and 861(a)(1), charged in this Indictment, defendants JOSE IVAN SERRANO, a/k/a "Joey," EDWARD CASTRO, JR., a/k/a "Eddie," a/k/a "Big E," LUIS JOSE ARIAS, a/k/a Obdulio Martinez, Jr., a/k/a Pedro Garces, a/k/a "Lite," RAYMOND JACKSON, a/k/a "Brooklyn," RAFAEL ROBLES, a/k/a "Deville," ISMAEL ROJAS, JR., a/k/a "Izzy," CARLOS LUIS SOTO, a/k/a "Carlito" shall forfeit to the United States of America:

a. any property which constitutes or is derived from any proceeds obtained directly or indirectly by them including, but not limited to the sum in excess of \$1,900,000 United States currency, in that such sum in aggregate was received in exchange for the distribution of a controlled substance, that is: cocaine base ("crack") and cocaine, Schedule II controlled substances.

b. any property which was used or intended to be used, in any manner or part, to commit or to facilitate the commission of the violations of Title 21, United States Code, Sections 846, 841(a)(1), 860(a) and 861(a)(1) charged in this Indictment.

SUBSTITUTE ASSETS

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of defendants JOSE IVAN SERRANO, a/k/a "Joey," EDWARD CASTRO, JR., a/k/a "Eddie," a/k/a "Big E," LUIS JOSE ARIAS, a/k/a Obdulio Martinez, Jr., a/k/a Pedro Garces, a/k/a "Lite," RAYMOND JACKSON, a/k/a "Brooklyn," RAFAEL ROBLES, ISMAEL ROJAS, JR., a/k/a "Izzy," CARLOS LUIS SOTO, a/k/a "Carlito,"

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Sections 853(a)(1), (2) and (p).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney